

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Hogan v. Childrens Guild Alliance

Hogan · No. Civil Action No. 2024-3057 (JMC) · Decided March 19, 2026

SUMMARY

The United States District Court for the District of Columbia grants Tiairra Hogan, proceeding pro se, leave to amend her Title VII discrimination and retaliation complaint. The court denies the defendant's motion to dismiss as moot and orders Hogan to file an amended complaint by May 4, 2026.

CASE DETAILS

|                       |                                                                                                                                                                |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the District of Columbia                                                                                                      |
| WRITING FOR THE COURT | Jia M. Cobb                                                                                                                                                    |
| JURISDICTION          | United States District Court for the District of Columbia                                                                                                      |
| DECIDED               | March 19, 2026                                                                                                                                                 |
| DOCKET                | Civil Action No. 2024-3057 (JMC)                                                                                                                               |
| DISPOSITION           | other                                                                                                                                                          |
| PROCEDURAL POSTURE    | Plaintiff filed a Title VII discrimination and retaliation action. Defendant moved to dismiss. Plaintiff responded and requested leave to amend her complaint. |
| PRECEDENTIAL VALUE    | published                                                                                                                                                      |
| PARTIES               | Tiairra Hogan v. Childrens Guild Alliance                                                                                                                      |

TOPICS

- motion to amend
- motions to dismiss
- title vii
- retaliation
- employment discrimination

PRACTICE AREAS

- civil procedure
- employment law
- civil rights

QUESTIONS PRESENTED

- Whether the pro se plaintiff should be granted leave to amend her complaint under Federal Rule of Civil Procedure 15(a)(2).
- Whether the defendant's motion to dismiss should be denied as moot after leave to amend is granted.

## HOLDINGS

1. Leave to amend should be granted under Federal Rule of Civil Procedure 15(a)(2) because justice requires it, particularly given Hogan's pro se status, her stated misunderstanding regarding the complaint's required contents, and Defendant's failure to oppose the request.
2. The motion to dismiss the original complaint is moot once leave to amend is granted.

## KEY QUOTATIONS

“But courts “should freely give leave” to amend “when justice so requires,” and it so requires here.” (1)

“When a plaintiff amends her complaint, it renders a motion to dismiss that complaint moot.” (2)

## FACTUAL BACKGROUND

Hogan brought claims alleging discrimination and retaliation in violation of Title VII of the Civil Rights Act of 1964. While responding to Defendant's motion to dismiss, she requested leave to amend based on her misunderstanding of what needed to be included in the complaint. Defendant did not respond to the request for leave to amend.

## PROCEDURAL HISTORY

Hogan filed a complaint alleging discrimination and retaliation under Title VII. Childrens Guild Alliance moved to dismiss, and the Court issued a Fox order directing pro se plaintiff Hogan to respond. Hogan requested leave to amend in her response; the Court granted leave to amend and denied the motion to dismiss as moot.

## DISPOSITION

other

## CASES CITED

- *Briscoe v. Costco Wholesale Corp.*, 61 F. Supp. 3d 78, 92 (D.D.C. 2014)
- *Texas v. United States*, 798 F.3d 1108, 1114 (D.C. Cir. 2015)
- *Atchinson v. District of Columbia*, 73 F.3d 418, 425 (D.C. Cir. 1996)
- *Gray v. D.C. Pub. Schs.*, 688 F. Supp. 2d 1, 6 (D.D.C. 2010)